

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

<p>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</p> <hr/> <p>THIS DOCUMENT RELATES TO:</p> <p>ALL PLAINTIFFS LISTED IN EXHIBIT A TO PLAINTIFFS' MOTION</p>	<p>Master File No. 2:12-MD-02327 MDL No. 2327</p> <p>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</p>
--	--

**ETHICON'S NOTICE OF ADOPTION OF PRIOR OPPOSITION TO PLAINTIFFS'
MOTION TO EXCLUDE OR OTHERWISE LIMIT THE OPINIONS AND TESTIMONY
OF SCOTT SERELS, M.D.**

Come now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Scott Serels, M.D., for Ethicon Wave 1, Dkt. [2226]. The Court previously overruled most of Plaintiffs' objects to Dr. Serels's testimony, Dkt. [2689]. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing and as adopted by this Court in its prior ruling.

Respectfully submitted,

ETHICON, INC., ETHICON LLC, AND
JOHNSON & JOHNSON

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)
Thomas Combs & Spann, PLLC
300 Summers Street, Suite 1380
P.O. Box 3824
Charleston, WV 23558-3824
(304) 414-1800

/s/ Christy D. Jones _____

Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones _____

Christy D. Jones

ButlerSnow 31041577v1
36344757.v1